

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

**DEFENDANT RICHARD W. GATES III'S MOTION TO EXTEND TIME FOR
INFORMING THE COURT OF THE NATURE OF ANY EXPECTED PRETRIAL
MOTIONS**

Richard W. Gates III., by and through counsel, hereby moves this Court to extend the time in which to file a response to the minute order issued Thursday, November 2, 2017 at 5:11 p.m., asking that counsel inform the Court of the nature of any pretrial motions they expect to file by 12 noon of the following day, Friday, November 3, 2017. Defendant respectfully requests that this Court extend the time for this response until at least November 5, 2017. The basis for this request is set forth below:

Counsel only entered their appearance into this case on the morning of Thursday, November 2, 2017. Counsel has not yet received any discovery in this case although steps are already underway to do so through active discussions with the government promptly undertaken by counsel. Accordingly, Counsel lacked sufficient time to determine by noon the following day what motions may be necessary in this case and asks that the deadline be extended until at least Sunday, November 5, 2017.

The position of the United States could not be ascertained with regards to this motion prior to filing but Defendant submits that the United States will not be prejudiced by this short extension of time.

WHEREFORE, Defendant Gates hereby respectfully moves this Court to extend the time by which counsel must inform the Court of the nature of any pretrial motions from November 3, 2017, to November 5, 2017.

Respectfully submitted,

/s/Shanlon Wu
Shanlon Wu
D.C. Bar No. 422910
Wu, Grohovsky & Whipple, PLLC
Ronald Reagan Building and International
Trade Center
1300 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
swu@dcwhitecollar.com
202-204-3053 office
202-747-7518 fax
Attorney for Richard Gates

Walter Mack
(Pro Hac Vice Admission to be filed)
Doar Rieck Kaley & Mack
217 Broadway, Suite 707
New York, NY 10007-2911
212-619-3730 (Telephone)
212-962-5037 (Facsimile)